

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Case No.: 4:07CR405 HEA
)
ROBERT D. HARTMANN,)
)
Defendant.)

MOTION TO CONTINUE

COMES NOW Defendant, and as grounds herefore shows to the Court as follows:

1. The above matter is set for trial on January 26, 2009.
2. The discovery in this case is exceedingly voluminous in that the Indictment makes reference to twelve (12) different pieces of property. Both counsel have been conferring with each other regarding this case and are trying to prepare agreed upon stipulations in order to save trial time.
3. Counsel for the Government has no objection to the Court granting a continuance from the January 26, 2009 setting.
4. Counsel presently believe that a setting in April, 2009 would give them sufficient time to complete a study and review of all of the discovery and to enter into those stipulations which they believe will be of benefit to the Court and the parties.
5. While Defendant has previously filed a Waiver of Speedy Trial, he will file an additional one in the next several days.

WHEREFORE, Defendant prays this Court continue the matter to April 20, 2009.

Respectfully submitted,

/s/Burton H. Shostak

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of December, 2008, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Mr. James E. Crowe, Jr.
Assistant United States Attorney
111 South Tenth Street, Room 20.33
St. Louis, Missouri 63102

/s/Burton H. Shostak